

1 GRIFFITH H. HAYES, ESQ.
Nevada Bar No. 7374
2 ALICIA A. HAGERMAN, ESQ.
Nevada Bar No. 10891
3 **LITCHFIELD CAVO LLP**
3993 Howard Hughes Parkway, Suite 100
4 Las Vegas, Nevada 89169
Telephone: (702) 949-3100
5 Facsimile: (702) 916-1776
Hayes@LitchfieldCavo.com
6 Hagermand@LitchfieldCavo.com

7 *Attorneys for Plaintiff*

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA – NORTHERN DIVISION**

10 THE CINCINNATI SPECIALTY
11 UNDERWRITERS INSURANCE COMPANY

12 Plaintiff.

13 v.

14 RED ROCK HOUNDS, a Domestic Nonprofit
Cooperative Corporation Without Stock (81);
15 LYNN LLOYD, individually; AND TRACY
TURNBOW (Interested Party)

16 Defendants.

17 RED ROCK HOUNDS, a Domestic Nonprofit
Cooperative Corporation Without Stock; and
18 BARBARA LYNN LLOYD,

19 Counterclaimants,

20 v.

21 THE CINCINNATI SPECIALTY
UNDERWRITERS INSURANCE COMPANY;
22 BEEHIVE INSURANCE AGENCY, INC., a
Utah corporation,

23 Counterdefendants.

24 BEEHIVE INSURANCE AGENCY, INC.

25 Third-Party Plaintiffs

26 v.

27 MOORE CLEMENS & CO., INC., a Virginia
Corporation, and DOES I-X, inclusive

28 Third-Party Defendants.

CASE NO.: 3:20-cv-00272-MMD-WGC

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF THE
CINCINNATI SPECIALTY
UNDERWRITERS INSURANCE
COMPANY TO FILE AN AMENDED
COMPLAINT PURSUANT TO COURT
ORDER (ECF No. 55)**

[SECOND REQUEST]

1 AMERICAN RELIABLE INSURANCE
2 COMPANY

3 Intervenor

4 Plaintiff/Counterdefendant, THE CINCINNATI SPECIALTY UNDERWRITERS
5 INSURANCE COMPANY, by and through its attorneys of record, the law firm of LITCHFIELD
6 CAVO LLP, Defendants/Counterclaimants RED ROCK HOUNDS, by and through its attorneys of
7 record, the law firm of Maupin Cox & LeGoy, Counterdefendant/Third-Party Plaintiff, BEEHIVE
8 INSURANCE dba CERTIFIED INSURANCE SERVICES, by and through its attorneys of record, the
9 law firm of Erickson, Thorpe & Swainston, Ltd., Third-Party Defendant MOORE CLEMENS & CO.,
10 by and through its attorneys of record, the law firm of Lewis Brisbois Bisgaard & Smith LLP, and
11 Intervener AMERICAN RELIABLE INSURANCE COMPANY, by and through its attorneys, the law
12 firm of Resnick & Louis, P.C., Defendant/Interested Party, TRACY TURNBOW, by and through her
13 attorneys of record, the law firm of Coulter Harsh Law, and BARBARA LYNN LLOYD, by and
14 through her attorneys of record, the law firm of Alling & Jillson, Ltd., (collectively “Parties”), hereby
15 jointly stipulate as follows:

16 1. Plaintiff filed this action on May 7, 2020 naming Tracy Turnbow, Red Rock Hounds,
17 and Lynn Lloyd as Defendants. (ECF No. 1)

18 2. In response to the complaint, Turnbow filed a Motion to Dismiss on July 17, 2021.
19 (ECF No. 10)

20 3. Red Rock filed a Joinder to Turnbow’s Motion to Dismiss on July 22, 2020. (ECF No.
21 14).

22 4. The Court issued an Order on January 6, 2021 granting in part and denying in part the
23 Defendants’ Motion to Dismiss. (ECF No. 55).

24 5. The Order granted Plaintiff leave to file an amended complaint. *Id.*

25 6. The Order granted Plaintiff 15 days, until January 21, 2021, to file its amended
26 complaint.

27 7. Following the Court’s order granting the Motion to Dismiss, the Parties through
28 counsel had discussions about extending the time for Plaintiff to file an amended complaint subject to

1 court approval so the parties could save fees and costs and hopefully resolve this matter and the
2 underlying matter at mediation which is currently scheduled for March 24-25 with Robert B.
3 Enzenberger.

4 8. Per Stipulation and Order filed January 19, 2021 (ECF No. 66), Plaintiff has up and
5 until April 9, 2021, to file its amended complaint.

6 9. The parties have agreed to extend the deadline for Plaintiff to file its Amended
7 Complaint to April 23, 2021.

8 10. Good cause exists to extend the deadline for Plaintiff to file an amended complaint as
9 the parties are engaging in continued settlement negotiations.

10 11. The parties are acting in good faith in requesting the court approve this stipulation.
11 This is Plaintiff's second request for extension.

12 **IT IS SO STIPULATED.**

13
14 Dated: April 7, 2021

LITCHFIELD CAVO LLP

15 By: /s/ Griffith H. Hayes, Esq.
16 Griffith H. Hayes, Esq.
17 Nevada Bar No. 7374
18 Alica A. Hagerman, Esq.
19 Nevada Bar No. 10891
20 3993 Howard Hughes Parkway, Suite 100
21 Las Vegas, Nevada 89169
22 T: 702-949-3100/F: 702-916-1779
23 Hayes@LitchfieldCavo.com
24 Hagerman@LitchfieldCavo.com
25 Attorneys for Plaintiff

26 Dated: April 7, 2021

MAUPIN COX & LEGOY

27 By: /s/ Rick R. Hsu, Esq.
28 Rick R. Hsu, Esq.
Nevada Bar No. 5374
4785 Caughlin Parkway
P.O. Box 30000
Reno, NV 89509
T: 775-827-2000
rhsu@mcllawfirm.com
Attorneys for Defendant/Counterclaimant Red
Rock Hounds

1 Dated: April 7, 2021

COULTER HARSH LAW

By: /s/ Curtis B. Coulter, Esq.
Curtis B. Coulter, Esq.
Nevada Bar No. 3034
403 Hill Street
Reno, Nevada 89501
T: 775-324-3380
curtis@coulterharshlaw.com
Attorneys for Defendant and Interested Party
Tracy Turnbow

6 Dated: April 7, 2021

ERICKSON THORPE & SWAINSTON, LTD.

By: /s/ John C. Boyden, Esq.
John C. Boyden, Esq.
Nevada Bar No. 3917
99 W. Arroyo Street
PO Box 3559
Reno, Nevada 89505
T: 775-786-3930
jboyden@etsreno.com
Attorneys for Counterdefendant and Third-
Party Plaintiff Beehive Insurance Agency

12 Dated: April 7, 2021

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Alice K. Herbolsheimer, Esq.
Alice K. Herbolsheimer, Esq.
Nevada Bar No. 6389
Jack Angaran, Esq.
Nevada Bar No. 711
5555 Kietzke Lane, Site 200
Reno, Nevada 89511
T: 775-827-6440
jack.angaran@lewisbrisbois.com
alice.herbolsheimer@lewisbrisbois.com
Attorneys for Third-Party Defendant Moore,
Clemens & Co., Inc.

20 Dated: April 7, 2021

RESNICK & LOUIS, P.C.

By: /s/ Andrew Kurpanek, Esq.
Prescott Jones, Esq.
Nevada Bar No. 11617
8925 West Russell Road, Suite 220
Las Vegas, NV 89148-2540
pjones@rlattorneys.com

Andrew Kurpanek, Esq. (*Pro Hac Vice*)
Resnick & Louis, P.C.
8111 East Indian Bend Rd.
Scottsdale, AZ 85250
akurpanek@rlattorneys.com
Attorneys for Intervenor American Reliable
Insurance Company

1 Dated: April 7, 2021

ALLING & JILLSON, LTD.

2 By: /s/ Richard J. McGuffin, Esq.

3 Richard J. McGuffin, Esq.

4 Nevada Bar No.: 12819

5 276 Kingsbury Grade, Suite 2000

6 Post Office Box 3390

Lake Tahoe, NV 89449-3390

rmcguffin@ajattorneys.com

Attorneys for Defendant Barbara Lynn Lloyd

ORDER

7 Pursuant to the parties' stipulation, **IT IS SO ORDERED** that Plaintiff shall have up to and
8 until April 23, 2021 to file its amended complaint.

9
10 DATED THIS 9th Day of April 2021.

11 

12

MIRANDA M. DU

13 CHIEF UNITED STATES DISTRICT JUDGE
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